EXHIBIT H

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24 February, 1997

VIA OVERNIGHT MAIL

Edward A. Yorkgitis, Jr.
Kelley Drye & Warren
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Re: ACSI v. BST
File No. E-96-20

Dear Chip:

Thank you for your letter of February 12. As I indicated to you in my message in response to your call last Friday, BellSouth needed until today to complete its responses to your request for information. The information supplementing interrogatories 5 and 9 should be available tomorrow, or Wednesday, at the latest; our response to information request No. 6 should be provided by tomorrow or Wednesday.

For convenience, we treated your letter as we would formal interrogatories, setting forth your initial information requests and providing BST's responses in bold face type. As I mentioned in my message, although there may be, as you noted, some inadvertent ambiguities in your letter, we have tried to read your requests with common sense, to respond to them in good faith with the hope of resolving some or all of your outstanding motions, and have not attempt to exploit any such ambiguities. I hope you will call me to discuss any additional concerns.

Thank you for working with me on the "Joint Stipulation" today. I have enclosed a new "Status Report" for your review.

BST Response to ACSI Letter Requesting Information

1. Issues related to the cost study estimates:

a. Time estimate issues: Confirm that the following statements are true or false. Except where specified, all of the references to "time" relate to actual (average) time rather than "cost study assumption" time, albeit the underlying issue is whether they are the same. If a statement is false, please explain in quantitative detail why the statement is false:[1]

i. The time for a stand alone DS0[2] reconfiguration is the same as the time for a "First" reconfiguration of a DS0 channelized off of either a DS1 or a DS3. **True.**

ii. In the case of a fully channelized DS3, the reconfiguration of a 644th "Additional" DS0 takes just as much time as the reconfiguration of the first "Additional" DS0. **True.**

iii. Also in the case of a fully channelized DS3, the 28th "First" DS0 takes just as much time as the initial "First" DS0. **True.**

iv. The time for a stand alone DS1 reconfiguration is the same the time to reconfigure a "First" DS1 channelized off of a DS3. **True.**

v. In the case of a fully channelized DS3, the 27th "Additional" DS1 takes just as much time as the first "Additional" DS1. **True.**

vi. The total time, as reflected in the cost study work papers, to reconfigure a "First" DS1 fully channelized down to DS0 level, is the actual time it takes to reconfigure a fully channelized DS1. (*See* Attachment for calculations based on work papers) **True.**

vii. The total time, as reflected in the cost study work papers, to reconfigure a "First" DS3 fully channelized down to DS0 level, is the actual time it takes to reconfigure a fully channelized DS3. (*See* Attachment for calculations based on work papers) **True.**

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[1] These would be among the questions that would be asked in a deposition of Mr. Charles Scott, Bill French or Pinky Reichert.

[2] Except where specified, the questions relate to both special and switched access. If the answer differs between switched and special access, please specify the difference. Otherwise, we will assume the answer is the same for both switched and special.

viii. When more than one fully channelized switched DS1 is reconfigured at one time, the total time, per "Additional" DS1, is reduced by only 65.5 minutes as compared to the "First" DS1 (*i.e.*, a total of 759.70 min. for the "First" DS1, compared to a total of 694.20 min. per "Additional" DS1). **True.**

ix. When more than one fully channelized switched DS3 is reconfigured at one time, the total time, per "Additional" DS3, is reduced by only 65.5 minutes as compared to the "First" DS3 (*i.e.*, a total of 19,618.16 min. for the "First" DS3, compared to a total of 19,552.16 min. per "Additional" DS3). **True.**

x. When more than one fully channelized special DS1 is reconfigured at one time, the total time, per "Additional" DS1, is reduced by only 65.5 minutes as compared to the "First" DS1 (*i.e.*, a total of 854.70 min. for the "First" DS1, compared to a total of 920.20 min. per "Additional" DS1). **True, assuming (1) the same customer of record for billing and maintenance and (2) all circuits are going to the same location.**

xi. When more than one fully channelized special DS3 is reconfigured at one time, the total time, per "Additional" DS3, is the same as for the "First" DS3. **False, because the time necessary to process a first circuit is always longer than the time necessary to process additional circuits. For example, there is time for the initial log-in to the Circuit Provisioning Center for the first circuit. Such time is not a part of any additional circuits on the same order.**

b. Please provide a narrative description of the cost study methodology.

The following describes the development of the nonrecurring costs for reconfiguration activities. Workpapers are identified as Workpapers 1 and 2, which have already been provided to ACSI.

1. NONRECURRING COST DEVELOPMENT

Nonrecurring costs are one-time costs which are incurred as a result of work activities associated with originating, provisioning, installing and completing orders initiated by customer requests for reconfiguration activities.

2. DESCRIPTION OF PROCEDURES

The first step in developing nonrecurring costs was to determine the cost elements to study. These cost elements were then described by all of the individual work functions required to provision the service. The reconfiguration work functions have been determined to be service order driven related activities. The next step identified the work groups within the various work centers involved in provisioning reconfiguration activities. The workflows listed expected tasks as a basis for unit work time data.

The next step determined work times for each work function associated with the nonrecurring costs of reconfiguration activities. The Subject Matter Expert Evaluation method was used to establish work times for this study. Subject Matter Experts are individuals knowledgeable end/or responsible for performing the functions.

In order to determine the total nonrecurring cost of reconfiguration activities the following steps were taken:

(1) A spreadsheet model is used to incorporate the specific work functions and labor rates. The work time for each work function was multiplied by the labor rate. This provided individual work function costs.

(2) Individual work function costs were then summed up to provide the total nonrecurring cost for each cost element studied.

Nonrecurring costs were developed on a Regional level using Regional Labor rates and work times.

3. SUMMARY WORKPAPERS

Workpaper 1 is a summary paper only. Workpaper 1 (Nonrecurring Cost Summary) summarizes the nonrecurring costs from Workpaper 2 (Nonrecurring Cost Development).

c. You have said that the cost material BellSouth provided are "work papers." What, if any, supporting documentation is there for these work papers? **There is no supporting documentation. The initial filing in 1993 was performed by individuals who are no longer employed by BellSouth. We are unable to locate any supporting documentation for this study. Charles Scott prepared the work papers for the February 1995 filing. Mr. Scott received worktime inputs verbally, and neither relied on, nor created, any documents other than the work papers previously submitted to ACSI.**

What was the source for the time estimates -- time and motion studies or do they reflect actual experience? **A combination of sources are reflected in the cost studies. They were based on time and motion studies, and have since been supplemented by Subject Matter Expert evaluations.**

Since the time the work papers you have provided were prepared, are there any new studies or sources of data reflecting the amount of time it actually takes to reconfigure? **No, there are no new studies or sources of data reflecting the amount of time it actually takes to reconfigure. The term "reconfigure" here is understood to mean the activities required to accomplish an Access Channel Termination Location Move pursuant to Sections 6.7.7 and 7.4.5 of**

BellSouth's FCC Tariff No. 1, which is the subject of ACSI's complaint, and for which BellSouth assesses a reconfiguration nonrecurring charge.

2. State cost studies: BellSouth has stated that only one state study has been completed. If the state cost study provides the same time and cost estimates for the different reconfiguration types (i.e., DS0, DS1, DS3, special, switched) as what was filed at the FCC, please so state. **The time estimates are identical. The costs results are different.**

   If different, please provide a copy of the cost study(subject to our confidentiality agreement) with an explanation why the state study has a different estimates of time and cost (*e.g.*, different methodology; more recent/older study; required by state to subsidize other services, etc.). **Over BellSouth's continuing objection, and subject to the Confidentiality Agreement in this case, BellSouth herewith provides a copy of the Florida cost study. The difference in costs is attributable solely to a difference in labor rates and applicable Gross Receipts Tax. The labor rates in the state cost study are rates developed specifically for the state of Florida. The labor rates used to support BellSouth's FCC tariff represented a weighted average of labor rates in BellSouth's nine states.**

3. Please provide updates to answers to Interrogatories Nos. 5 and 9 (and any other answers, as appropriate). **These will be provided as soon as practicable, and every attempt is being made to provide them prior to February 27, 1997, the scheduled status conference.**

4. Please provide a clearer statement as to answer to Interrogatory No. 5: are the reconfigurations reflected in the table only those for which there was an NRC charged? **Yes.**

   If so, what are the total numbers of reconfigurations where an NRC was not charged (*e.g.*, because BellSouth remained the service provider and the point of termination did not change)? **BellSouth does not maintain records for items for which no charge applies. In any event, a "reconfiguration" as used in the relevant tariff and as used in ACSI's complaint refers to activities associated with ACTL Moves, and for which NRCs are charged. If BellSouth remained the service provider, and the point of termination did not change, then no ACTL Move occurred, no reconfiguration occurred, and no NRC was assessed.**

   Do the DS1 specials represent DS1s channelized off of a DS3 or only stand alone DS1s? If the DS1s are part of channelized DS3s, is it true that all of the switched DS1s in the answer were stand alone? **BellSouth's records used to develop the response to the interrogatory do not reflect the difference between "channelized" and "non-channelized DS1 circuits.**

5. Are any of the reconfigurations reflected in the response to Interrogatory No. 9 reflected in the answer to Interrogatory No. 5? **No, because the activities reflected in the**

response to Interrogatory No. 9 are not assigned the same USOC codes as the activities reflected in the answer to Interrogatory No. 5.

6. Interrogatory No. 5 does not show any Special Access DS3s reconfigured, yet your update to Interrogatory No. 8 indicates that some have been. Please update Interrogatory No. 5 to reflect such special access DS3 reconfigurations.

Moreover, Interrogatory No. 5 is not limited to those for which an NRC was charged. Presumably, those for which an NRC was not charged were all BST-BST reconfigurations (*see* item 4, above). **Response forthcoming.**

7. The answer to Interrogatory No. 3 does not explain the differences between an ACTL move and a NOW reconfiguration of entrance facility circuits. Please provide such an explanation. **Please see the following documents in the record which establish the difference between an ACTL Move and a rearrangement of facilities formerly available under the NOW program: BellSouth Tariff FCC No. 1, Sections 6.7.7 and 7.4.5 for ACTL Moves and BellSouth Tariff FCC No. 1, Section 7.4.20 for NOW. In its simplest terms, an ACTL Move results in one end of a facility being physically moved, whereas in a NOW rearrangement both ends of a facility remain the same.**

8. It is ACSI's position that the various "moves" that BellSouth describes in its Opposition to ACSI's Motion to Compel - Second (pp. 5-6) as well as NOW Moves (Interrogatory No. 9) are reconfigurations to which the *Expanded Interconnection Orders* apply. **This may be ACSI's position, but as a factual matter, the activities which BellSouth describes in its Opposition to ACSI's Motion to Compel-Second at pp. 5-6 are not all the same. BellSouth has described the differences between them. There is no such thing as a NOW Move. This term appears nowhere in any BellSouth Tariff and nowhere in any pleading filed in this proceeding to date. Under NOW, both ends of a facility were required to remain in place, thus, there was no "move."**

Thus, all of these reconfigurations are subject to the requirement that the difference in NRCs for different reconfigurations must reflect the differences in costs for the various types of reconfigurations. **This is ACSI's legal argument, and does not call for additional information.**

Obviously, in this case, the relevant comparison is one between these other reconfiguration types and ACTL moves for which the RNRCs at issue are charged. **This is comparing apples ("other reconfiguration types") to oranges ("ACTL moves").**

Moreover, reconfigurations to a CAP, by definition, involve an ACTL move, whereas a reconfiguration by a customer remaining with BellSouth that is physically otherwise the same way may not involve an ACTL move. **It is imprecise, and incorrect, to use the term "reconfiguration" to describe both activities, as this implies that the time and cost necessary to accomplish each activity is or should be identical. A "reconfiguration by a customer. . . that is physically otherwise the same. . .may not**

involve an ACTL Move" is a non-sequiter because a CAP reconfiguration, involving an ACTL Move is not physically the same as a rearrangement under NOW that does not involve an ACTL move because in the one case, at least one end changes, while in the other, the ends remain the same.

Accordingly, we renew our request that BellSouth explain the differences in the steps required to effectuate the various types of reconfigurations. **Again, it is imprecise to speak of "various types of reconfigurations." Not all moves, rearrangements, or other activities associated with changes in a customer's facilities arrangement are "reconfigurations" for which nonrecurring reconfiguration charges apply, let alone ACTL Moves". The differences in the types of activities are set forth in the tariffs, the cost studies filed with the tariffs, and in the discovery related pleadings.**

9. With regard to Interrogatory No. 15, BellSouth answered the question as to the difference mentioned in the Interrogatory by way of example. **This appeared to BellSouth to be an appropriate way to respond, since this is the scenario specifically set forth by ACSI in its example.**

The main [sic] identified in the work papers that we would like to have explained, as noted in our Motion to Compel, are the time and cost differences between the DS0 switched and special circuits (especially in light of the fact that the time and cost for a DS1 is the same for both special and switched circuits). **DS0 switched circuits are different from DS0 special circuits. When customers buy DS0 switched circuits through Feature Group B, C or D message trunks, these trunks are more expensive to provision than DS0 special circuits because BellSouth has to perform special translations for the switched circuits. It is generally more expensive to do a carrier DS1 than special access.**

10. State whether there have been any further "standardizations" or "mechanizations" in the past two years that would affect the time or cost estimates included in the 1Q 1995 work papers. If there have been, explain what they are and how they affect the time and cost estimates. **There have been no further "standardizations" or "mechanizations" in the past two years that would materially affect the time or cost estimates included in the 1Q 1995 work papers with respect to DS0 circuits. However, Brian Blanchard has developed a software program, the Task Mate PC program, which mechanically provisions carrier systems. This program reduces the CPC set up time for Switched and Special Channelized DS1 circuits subject to ACTL moves from 45 minutes to two or three minutes, and the time for a Switched Channelized DS3 from 37.7 minutes to 5 minutes for the first circuit. The worktime for an additional also decreased to 2 minutes.**

BellSouth attaches herewith a matrix showing how use of this mechanical provision affects the time and cost estimates filed in 1Q 1995. The Column on the left contains the information set forth in the attachment to ACSI's February 12 letter;

the column on the right shows how that information is affected by the Task Mate PC program.

* * *

Again, I look forward to working with you to narrow the issues.

Very truly yours,

Theodore R. Kingsley

cc: M. Robert Sutherland
Richard M. Sbaratta

ATTACHMENT

EXISTING		PRESENT MECH.	
SWITCHED DS1:		**SWITCHED DS1:**	
1 DS1	110.06 min.	1 DS1	77.36 min.
24 DS0s	649.64 min.	24 DS0s	649.64 min.
TOTAL	759.70 min. or 12.66 hr.	TOTAL	727.00 min. 12.12 hr.
SWITCHED DS3:		**SWITCHED DS3:**	
1 DS3	115.06 min.	1 DS3	82.36 min.
28 DS1s	1313.18 min.	28 DS1s	924.08 min.
672 DS0s	18182.92 min.	672 DS0s	18182.92 min.
TOTAL	19618.16 min. 326.97 hr.	TOTAL	19189.36 min. or 319.82 hr.
SPECIAL DS1:		**SPECIAL DS1:**	
1 DS1	110.06 min.	1 DS1	77.36 min.
24 DS0s	810.14 min.	24 DS0s	810.14 min.
TOTAL	920.20 min. or 15.34 hr.	TOTAL	887.50 min. 14.79 hr.
SPECIAL DS3:		**SPECIAL DS3:**	
1 DS3	0.00 min.	1 DS3	0.00 min.
28 DS1s	1313.18 min.	28 DS1s	924.08 min.
672 DS0s	22,683.92 min.	672 DS0s	22,683.92 min.
TOTAL	23,999.10 min. or 399.99 hr.	TOTAL	23608.00 min. or 393.47 hr.

EXHIBIT I

7. Special Access Service (Cont'd)

7.2 Rate Regulations (Cont'd)

7.2.7 Moves

A move involves a change in the physical location of one of the following:

- The service facility (C)
- The Point of Termination at the customer's premises
- The customer's premises

The charges are dependent on the type of move requested by the customer.

(A) Service Facility Move (SFM) (T)

An SFM is a customer-initiated move of one end of a Telephone Company central office distribution link (e.g., jumper cable, DSX patch cable, etc.) from one facility to another existing facility (of the same or higher transmission speed). All activity associated with the SFM must occur within a single Telephone Company location (central office).

In order to be considered an SFM, all associated order activity (disconnects and new connects) must occur simultaneously and the facility to which service is being moved must be existing and have sufficient capacity to accept the moved service.

An SFM may result in the change of one end point (i.e., customer premises location) of the circuit involved provided the following conditions are met:

(1) The change of customer premises can only occur on the end of the circuit which has the CFA.
(2) The customer premises locations involved in the change belongs to the same customer.

- or -

The customer premises locations involved in the change belongs to two different customers but the customer requesting the SFM has previously coordinated the activity such that all activity (disconnects and new connects) will occur simultaneously. If this coordination has not been accomplished beforehand, then the Telephone Company will proceed with the disconnect/new connect orders as non-related and new installation charges will apply for services being relocated. (T)

Certain revised material previously appearing on this page now appears on 1st Revised Page 7-41.

7. Special Access Service (Cont'd)

7.2 Rate Regulations (Cont'd)

7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd)

On facility moves involving multiplexed (subtending) channels, SFMs shall be charged only for the higher level facility provided the entire facility (the full complement of subtending channels) is being moved concurrent to that particular SFM request. If the subtending channels are requested to be moved one at a time, the SFM will be charged on a per each channel moved basis. (C)

Example 1

An SFM is requested to move 20 DS1s, with subtending VG channels, to a DS3 facility (where the DS3 end of the channel is moving to a new customer premises location). The resulting SFM charge will be 20 DS1 to DS3 SFM charges with no SFM charges for the subtending VG channels.

Example 2

An SFM is requested to move a DS3, with subtending DS1 channels, to another DS3 facility (where there is no change in the customer premises location on the DS3 facility end of the circuit). The resulting SFM charge will be a DS3 to DS3 SFM with no SFM charges for the subtending DS1 channels.

Example 3

An SFM is requested to move 6 DS1s, with subtending VG channels, previously riding one DS3 facility to another DS3 facility. The resulting SFM charge would be (6) DS1 to DS3 SFMs with no SFM charges for the subtending VG channels. (C)

SFMs may be performed at the following service levels:

- Analog*/MegaLink Data to 1.544 Mbps High Capacity (DS1)
- 1.544 Mbps High Capacity (DS1) to 1.544 Mbps High Capacity (DS1)/ReliaNet (DS1)
- 1.544 Mbps High Capacity (DS1) to MegaLink Custom (DS3)/ReliaNet (EC-1/DS3)

The charges for an SFM for the services shown above are detailed in 7.4(A) (SFMs) following. There will be no change in minimum period requirements.

The diagrams following illustrate typical service arrangements before and after an SFM has occurred.

* Analog services include: Metallic Service, Telegraph Grade Service, Voice Grade Service or Program Audio Service.

ACCESS SERVICE

7. Special Access Service (Cont'd)

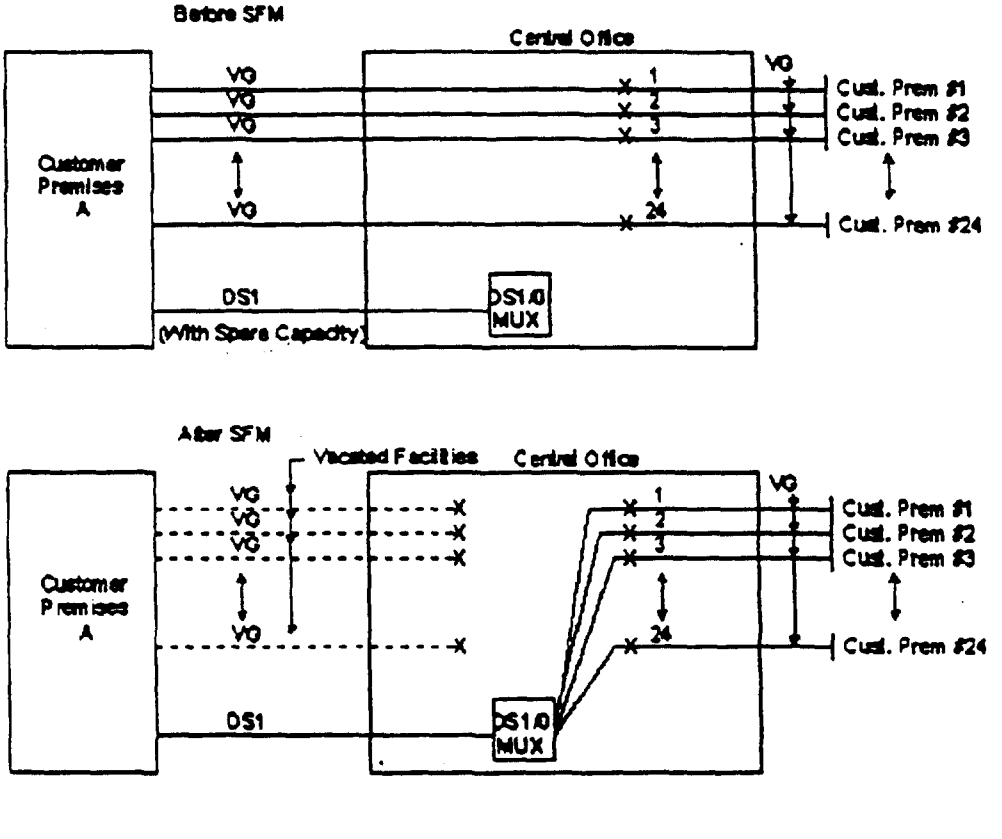
7.2 Rate Regulations (Cont'd)

7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd) (T)

EXAMPLE 1

MLD/VG to DS1 SFM - SAME CUSTOMER PREMISES
(All 24 Moved at Same Time)



(N)

(N)

(This page filed under Transmittal No. 2588)

ACCESS SERVICE

7. Special Access Service (Cont'd)

7.2 Rate Regulations (Cont'd)

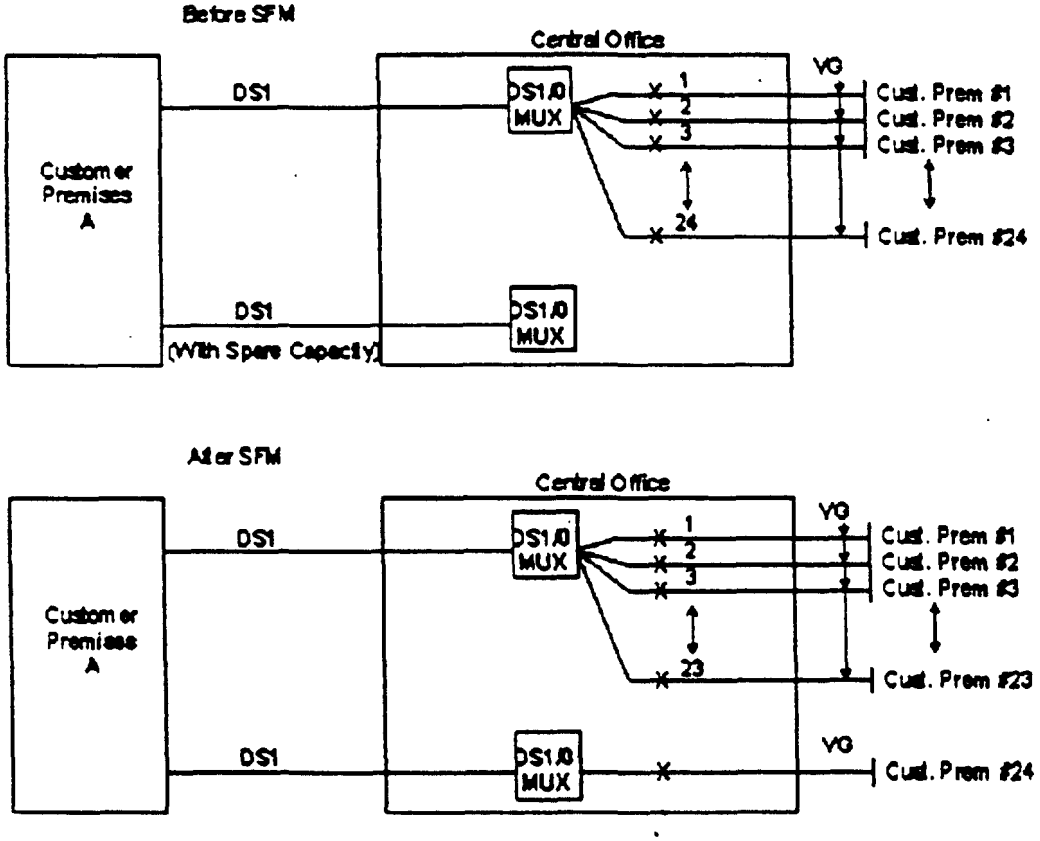
7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd) (T)

(N)

EXAMPLE 2

MLD/VG to DS1 SFM - SAME CUSTOMER PREMISES
(Move one ODS/VG at a time)



(N)

7. Special Access Service (Cont'd)

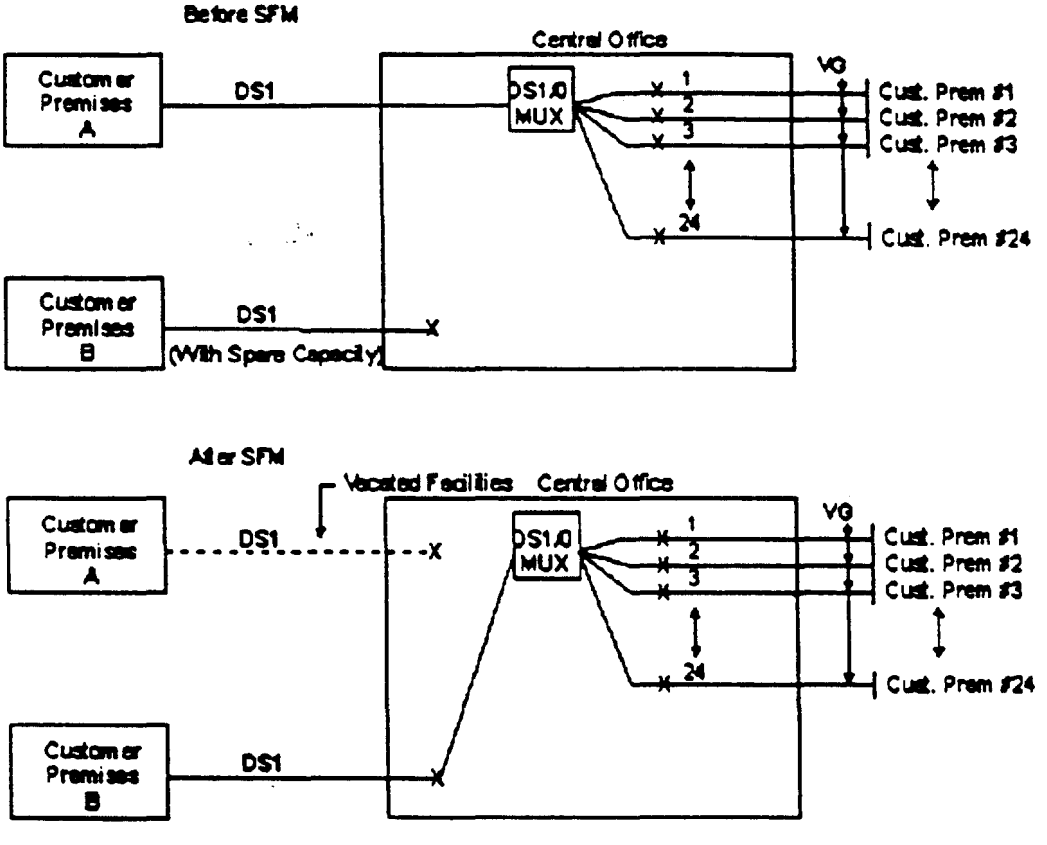
7.2 Rate Regulations (Cont'd)

7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd) (T)

EXAMPLE 3 (N)

MLD/VG to DS1 SFM -DIFFERENT CUSTOMER PREMISES
(All 24 Moved at Same Time)



(N)

ACCESS SERVICE

7. Special Access Service (Cont'd)

7.2 Rate Regulations (Cont'd)

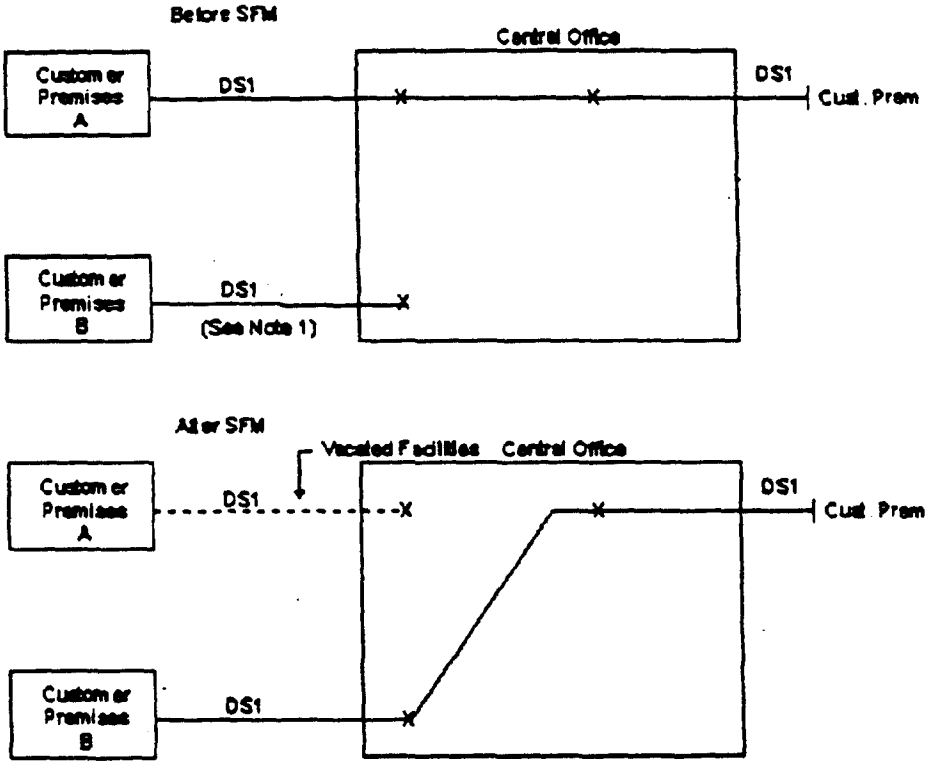
7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd) (T)

(N)

EXAMPLE 4

DS1 to DS1 SFM -DIFFERENT CUSTOMER PREMISES



Note 1: This facility may exist as a result of an order for DS1 service concurrent with the SFM request or, in the case of virtual collocation, as a cross-connect arrangement requested by the interconnector.

(N)

7. Special Access Service (Cont'd)

7.2 Rate Regulations (Cont'd)

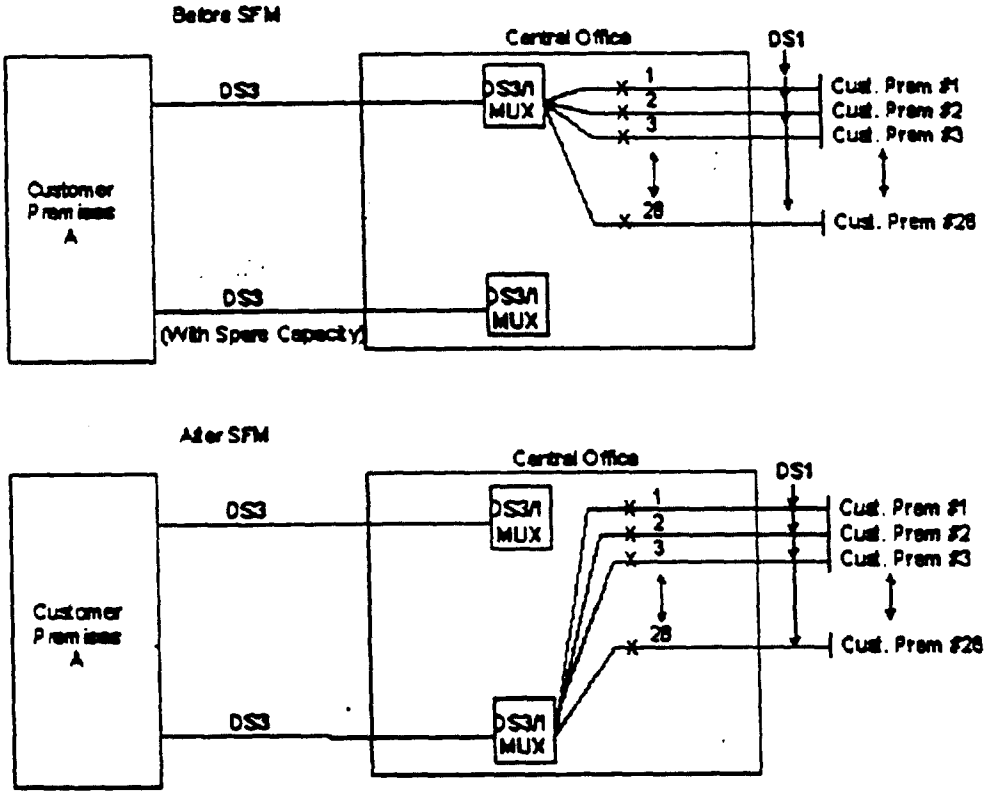
7.2.7 Moves (Cont'd)

(A) Service Facility Move (SFM) (Cont'd) (T)

(T) (M)

EXAMPLE 5

DS1 to DS3 SFM -SAME CUSTOMER PREMISES
(DS1 all moved at same time)



(T) (M)

Revised material appearing on this page formerly appeared on Original Page 7-41.

(This page filed under Transmittal No. 2588)

ACCESS SERVICE

7. Special Access Service (Cont'd)

7.4 Miscellaneous Rates and Charges

(A) Service Facility Move (SFM) (T)

(1) Basic Service Description

A Nonrecurring Charge(s) will apply when a customer requests an SFM of Special Access Service as described in 7.2.7(A) (SFM). The Nonrecurring Charge(s) is applied on a first and additional basis, per Access Order, as specified below. (T) (T)

(2) Rates and Charges

	Nonrecurring Charge 1st Ckt	Addl Ckt	
(a) Analog*/MegaLink Data to 1.544 Mbps High Capacity (NRBRA)			
Per service moved	$100.00(R)	$ 50.00(R)	(T)
(b) 1.544 Mbps High Capacity to 1.544 Mbps High Capacity or ReliaNet 1.544 Mbps (NRBRH)			
Per service moved	$125.00(R)	$ 90.00(R)	(T)
(c) 1.544 Mbps High Capacity to MegaLink Custom or ReliaNet DS3/EC-1 (NRBR1)			
Per service moved	$150.00(R)	$120.00(R)	(T)

* Analog services include: Metallic Service, Telegraph Service, Voice Grade Service or Program Audio Service.

(This page filed under Transmittal No. 2588)

ACCESS SERVICE

7. Special Access Service (Cont'd)

7.4 Miscellaneous Rates and Charges (Cont'd)

		Monthly Rate	Nonrecurring Charge 1st Ckt	Nonrecurring Charge Addl Ckt
(B)	Special Access Surcharge (S25)			
	Per equivalent voice grade channel	$ 25.00		
(C)	Message Station Equipment Recovery Charge (UTM)			
	Per Special Access Surcharge assessed	$ 2.01		
(D)	Access Order Charge		See Section 5.2	
(E)	Service Rearrangement Charge			
	Per circuit * on the same Access Order for one or any combination of the following changes:		$ 9.00	$ 5.00
	Access Carrier Name Abbreviation (ACNA)			(D) (D)
	Billing Account Number (BAN)			
	Customer Circuit ID (CKR)			

* Each leg of a multipoint service will be treated as a separate circuit and charges applied as described in 7.2.4(D) (Service Rearrangements).

(This page filed under Transmittal No. 2285)

EXHIBIT J

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

American Communications Services, Inc. Complainant	)	
v.	)	File No. E-96-20
BellSouth Telecommunications, Inc. Defendant	)	

RESPONDENT'S ANSWERS TO COMPLAINANT'S SECOND SET OF INTERROGATORIES

Respondent, BellSouth Telecommunications, Inc. ("BellSouth"), by its attorneys, pursuant to Section 1.729(a), of the Commission's Rules, 47 C.F.R. §§ 1.729(a), and the Order entered in this matter on July 2, 1996, hereby answers the interrogatories served on it by complainant American Communications Services, Inc. ("ACSI") in the above referenced docket. Responding to each numbered question, Respondent states the following.

GENERAL OBJECTIONS

General Objection No. 1

ACSI has exceeded the number of interrogatories (including subparts) allowed under the Commission's rules. ACSI's First Set of Interrogatories contained 25 separate interrogatories, including subparts. The Commission's Rules limit the amount of interrogatories to 30 single interrogatories without Commission approval. 47 C.F.R. § 1.729. ACSI has propounded 42 interrogatories (including subparts) through its First and Second Interrogatories.

General Objection No. 2

BellSouth objects to each interrogatory to the extent it seeks information that is not relevant to this proceeding.

General Objection No. 3

BellSouth objects to complainant's instructions and definitions to the extent that they purport to impose requirements that are not authorized by the Commission's rules, are overbroad and unduly burdensome.

General Objection No. 4

BellSouth objects to each and every interrogatory to the extent it seeks information or documents that are not in BellSouth's possession, custody, or control.

ANSWERS

Interrogatory No. 10.

When making changes to its Business Office Carrier Access Billing System ("CABS") database, its Trunk Inventory Records Keeping System ("TIRKS") database, or any other database as the result of accommodating an access customer's reconfiguration request, does BellSouth utilize any computer macros for the purpose of improving the efficiency of making database changes associated with the reconfiguration of access facilities? An example of such a macro in the case of a reconfigured DS3 would be a single series of keystrokes that would change the information in the CABS database automatically for the DS3 circuit as well as all subsidiary DS1 and DS0 circuits. If computer macros are used in the manner described above; provide the dates that each such macro was first used by BellSouth; describe each such macro in detail and the extent to which it operates to eliminate repetitive activity in updating CABS, TIRKS, and other databases; and identify all documents that refer to or relate to each such macro. Please also describe in detail the extent to which the introduction of each macro by BellSouth reduces the incremental costs associated with the reconfiguration of DS1 or DS3 access facilities, both on a "First" circuit basis,[1] as well as for additional channels.

Answer No. 10:

BellSouth does not utilize computer macros.

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[1] See Interrogatory No. 14(a).

Interrogatory No. 11.

Describe the extent to which BellSouth accepts "cut sheets" from access customers that are reconfiguring their access facilities in order to facilitate the updating of the BellSouth CABS, TIRKS, or other databases that must be verified or changed as part of accommodating a reconfiguration. A "cut sheet" is a summary report in computer data format that replaces or complements the Access Service Request ("ASR"). The cut sheet is formatted to meet BellSouth specifications and contains the most relevant information found on an ASR and allows BellSouth to confirm or update its circuit inventory automatically without the need for manual key entry of the information on the ASR or "cut sheet". A "cut sheet" associated with the reconfiguration of a customer to a competitive access provider, for example, would include data that identifies the preexisting BellSouth circuit routing and the new competitive access provider circuit routing. This information would be listed at the lowest circuit level for each facility being reconfigured, i.e., DS0 or DS1. If "cut sheets" are used, describe in detail (consistent with instruction No. 2) the cost savings associated with the use of "cut sheets" for the reconfiguration of DS1 or DS3 facilities, and identify any documents that refer to or relate to such cost savings.

Answer No. 11:

BellSouth occasionally accepts "cut sheets" as a courtesy to its customers. The customer's desired due date for the project must be taken into consideration when determining whether or not a "cut sheet" can be used. Once the decision has been made to accept a "cut sheet," the Interexchange Customer Service Center ("ICSC") determines whether, depending upon the customer's desired due date, a mechanical process of creating the Exchange Access Control Tracking System ("EXACT") ASRs ultimately used to create the service orders is feasible. If the customer's time-frame is such that the needed time for development and testing can be met, ICSC will then agree to pursue the development of a mechanized program to generate the ASRs and service orders. BellSouth network personnel work activity is driven by the actual service orders that are generated.

For each request, specific details of the changes must be identified and agreed upon by all impacted BellSouth departments. For example, if the billing changes, programming must be written to establish new accounts. If additional information changes, such as the Access

Customer Terminal Location ("ACTL"), the impact of these changes on existing records must also be assessed.

Once all known changes have been identified, development of the program used to generate the EXACT ASRs and service orders begins. Once the program has been developed, testing of the program must be performed. Output from the tests must be verified to ensure that the expected results are being achieved.

Once the program has been developed and tested, the actual generation of the ASRs and service orders begins. Any activity that cannot be accomplished via the program (known as "fallout") must then be investigated manually and the appropriate corrective action taken, such as changing the program or having a BellSouth service representative correct the situation manually. As service orders continue to be reviewed, additional corrective activity might be required. Such correction may require the cancellation of the initial service order or updating data on the existing order. To ensure correct billing, the completion of the service orders must be manually controlled. For example, the DS1 must not be disconnected from the Business Office CABS ("BOCABS") records prior to disconnecting all circuits riding this facility. In turn, the DS3 cannot be disconnected from these records until all DS1s have been disconnected (the reverse is also true, i.e., the DS1 cannot be turned up until the DS3 has been established in BOCABS.)

The time required to develop the programming and to sufficiently test each situation is different for each customer. The amount of manual fallout and the time required for corrections for each reconfiguration is different. Cut sheets are not a cost-savings measure for BellSouth. BellSouth network personnel cannot work from a cut sheet alone. Order activity must be logged into the TIRKS® System utilizing the service order. In order to perform design activities, assign